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Attorneys for Defendant  
THE HERTZ CORPORATION

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

GLORIA CARDONA HENRY, an individual,

Plaintiff,

v.

THE HERTZ CORPORATION, a Corporation,  
and DOES 1 through 50, inclusive,

Defendants.

Case No.

**DECLARATION OF YOON-WOO NAM  
IN SUPPORT OF DEFENDANT'S  
NOTICE OF REMOVAL**

I, Yoon Woo Nam, declare as follows:

1. I am a partner with the law firm of Seyfarth Shaw LLP, counsel for Defendant The Hertz Corporation (“Hertz”) in the above-entitled matter. I am admitted to practice law in the State of California and before this Court. I am one of the attorneys representing Hertz in this action.

2. I make this declaration based on my personal knowledge, except as to those matters stated on information and belief, and as to those matters, I believe them to be true. If called as a witness to do so, I could and would testify competently thereto.

3. On June 16, 2025, Plaintiff served Hertz with a copy of the Summons and Complaint.

4. On July 16, 2025, Hertz filed its Answer to the State Court Action in the Alameda County Superior Court.

5. Defendant has not filed or received any other pleadings or papers in this action, other than the pleadings described in Exhibit 1 to the Notice of Removal. There are no pending hearings currently scheduled in the Alameda County Superior Court in the State Court Action besides the initial case management conference on November 12, 2025.

6. Based on my experience, attorneys’ fees in employment cases often exceed \$75,000. Defendant anticipates that the Parties will propound written discovery, that depositions will be taken in this case, and that Defendant will file a Motion for Summary Judgment or Partial Summary Judgment. It is more likely than not that the fees in this case will exceed \$75,000 through discovery and a summary judgment hearing, and the fees would certainly exceed \$75,000 if the case proceeds to trial.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 16th day of July, 2025 in Sacramento, California.

/s/ Yoon-Woo Nam  
Yoon-Woo Nam